

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

**MICHAEL DONALDSON,**

**Plaintiff,**

**v.**

**TRAE-FUELS, LLC, *et al.***

**Defendants.**

**Case No.: 3:18-cv-00097**

**PLAINTIFF'S PRETRIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the scheduling order in this case, Plaintiff Michael Donaldson identifies the following witnesses for trial (order yet to be determined):

**A. Donaldson expects to call the following witnesses:**

1. Plaintiff Michael Donaldson
2. Kevin Whyrick
3. Beth Aleman
4. Frances Holliday Olbert
5. Chetan Pai, D.O.
6. Christy Donaldson
7. Dr. Derek Ross

**B. Donaldson may call the following witnesses if the need arises:**

1. John Frink
2. Roger Knoph
3. Christopher LaRocco

4. Debby Vannest
5. Michelle Mills
6. Gohar Wise
7. Clayton Walker
8. Christian Bach

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the scheduling order in this case, Plaintiff Michael Donaldson submits his Exhibit List. This list presents the exhibits that Donaldson either intends to use at trial or, as circumstances warrant, may determine to use at trial. Donaldson reserves the right to amend this list upon review of Defendants' exhibit list as necessary and consistent with the Federal Rules of Civil Procedure and local rules of this Court. Donaldson further reserves the right to use at trial any documents not identified on this list for purposes of impeachment or rebuttal.

Donaldson expects to offer the following exhibits:

<b>Exhibit #</b>	<b>Item Description</b>	<b>Bates #</b>
1	12/26/13 email	Trae 2227-29
2	4/30/14 email	Trae 7335-7338
3	5/29/14 email	Trae 8084
4	12/19/13 email	Trae 2105-07
5	1/22/14 email	Trae 3160-61
6	2/6/14 email	Trae 4053-54
7	2/19/14 email	Trae 4637
8	11/8/13 email	Trae 747-48
9	12/18/13 email	Trae 2028
10	1/2/14 email	Trae 2444-49
11	1/9/14 email	Trae 2660
12	1/15/14 email	Trae 2826
13	2/8/14 email	Trae 4613-14
14	3/18/14 email	Trae 5833
15	3/21/14 email	Trae 5958-59
16	12/27/13 email	Trae 2330
17	1/7/14 email	Trae 2587
18	2/18/14 email	Trae 4509-11

19	4/1/14 email	Trae 6297-98
20	5/20/14 email	Trae 7921-25
21	5/20/14 email	Trae 7927-31
22	5/27/14 email	Trae 8108-09
23	6/9/14 email	Trae 8429-30
24	5/29/14 email	Trae 8104
25	6/2/14 email	Trae 8256-57
26	6/9/14 email	Trae 8429-31
27	6/26/14 email	Trae 8962-63
28	7/22/14 email	Trae 9760-62
29	Whyrick report	Trae 28-31
30	Mills report	Trae 6-7
31	6/21/14 email	Trae 8816
32	7/22/14 email	Trae 9781-85
33	6/17/14 email	Trae 8671-72
34	5/20/14 email	Trae 7886
35	5/20/14 email	Trae 7911-14
36	7/23/14 email	Trae 9828
37	6/9/14 email	Trae 8468-69
38	Termination letter	Trae 58
39	2/20/14 email	Trae 4786-87
40	EEOC Position Statement	Trae 19-35
41	5/20/14 email	Trae 7910
42	5/29/14 email	Trae 8147-48
43	5/30/14 email	Trae 8178
44	6/3/14 email	Trae 8290
45	6/3/14 email	Trae 8298-300
46	6/16/14 email	Trae 8618
47	6/17/14 email	Trae 8637-38
48	7/3/14 email	Trae 9246-47
49	Defendants' Discovery Responses	n/a
50	4/30/14 email	Trae 7314-15
51	4/30/14 email	Trae 7324-26
52	5/29/14 email	Trae 8084
53	5/5/14 email	Trae 7476-78
54	5/19/14 email	Trae 7866
55	12/17/13 email	Trae 2297
56	2/14/14 email	Trae 4348-49
57	3/18/14 email	Trae 5833
58	Employee counseling form	Trae 20
59	1/16/14 email	Trae 2896-900
60	1/20/14 email	Trae 3039
61	1/24/14 email	Trae 3241-42
62	2/13/14 email	Trae 4258-59
63	2/16/14 email	Trae 4028-29

64	4/3/14 email	Trae 6467-70
65	12/27/13 email	Trae 2330
66	1/7/14 email	Trae 2587
67	4/1/14 email	Trae 6297-98
68	1/24/14 email	Trae 3241-42
69	7/2/14 email	Trae 9195-96
70	6/18/14 email	Trae 8700
71	6/27/14 email	Trae 9060
72	8/4/14 email	Trae 10198-99
73	5/30/14 email	Trae 8176
74	6/16/14 email	Trae 8626-28
75	Mary Washington Hospital Lab Order	Don. 182-83
76	Gastroenterology Assoc. of Fredericksburg Report	Don. 184-86

Donaldson may introduce the following exhibits if the need arises:

Exhibit #	Item Description	Bates #
77	1/13/14 email	Trae 2706
78	1/16/14 email	Trae 2907
79	1/16/14 email	Trae 2946-52
80	1/16/14 email	Trae 2968-69
81	1/20/14 email	Trae 3039
82	1/21/14 email	Trae 3079
83	1/24/14 email	Trae 3219-20
84	1/24/14 email	Trae 3238-39
85	2/10/14 email	Trae 4137
86	2/11/14 email	Trae 4198
87	2/12/14 email	Trae 4200-01
88	2/18/14 email	Trae 4458
89	2/20/14 email	Trae 4719-20
90	2/27/14 email	Trae 5229
91	2/21/14 email	Trae 4797-98
92	3/3/14 email	Trae 5280
93	3/18/14 email	Trae 5778
94	3/18/14 email	Trae 5834-37
95	3/18/14 email	Trae 5856
96	3/28/14 email	Trae 6206
97	3/28/14 email	Trae 6216
98	3/31/14 email	Trae 6233-34
99	3/31/14 email	Trae 6253
100	4/2/14 email	Trae 6344-45
101	4/7/14 email	Trae 6557-58
102	4/14/14 email	Trae 6733-42
103	4/16/14 email	Trae 6914-15
104	4/16/14 email	Trae 6916

105	4/22/14 email	Trae 7138-42
106	4/24/14 email	Trae 7156
107	4/25/14 email	Trae 7196-210
108	5/7/14 email	Trae 7573-82
109	5/8/14 email	Trae 7616-17
110	5/19/14 email	Trae 7857
111	5/20/14 email	Trae 7870-74
112	5/27/14 email	Trae 8042-43
113	5/27/14 email	Trae 8050-52
114	6/3/14 email	Trae 8273-74
115	6/3/14 email	Trae 8292-94
116	6/9/14 email	Trae 8462-64
117	6/9/14 email	Trae 8465
118	6/9/14 email	Trae 8473-76
119	6/13/14 email	Trae 8565
120	6/17/14 email	Trae 8640-41
121	6/17/14 email	Trae 8648-53
122	6/20/14 email	Trae 8792
123	6/30/14 email	Trae 9087-88
124	7/1/14 email	Trae 9166-67
125	7/2/14 email	Trae 9211
126	7/14/14 email	Trae 9446
127	7/14/14 email	Trae 9447
128	7/16/14 email	Trae 9593-96
129	7/21/14 email	Trae 9735
130	7/30/14 email	Trae 10093-95
131	7/30/14 email	Trae 10103
132	7/31/14 email	Trae 10112
133	8/2/14 email	Trae 10160
134	8/11/14 email	Trae 10366
135	8/12/14 email	Trae 10438-42
136	8/17/14 email	Trae 10531
137	8/18/14 email	Trae 10622
138	8/20/14 email	Trae 10704

Dated: December 2, 2019

RESPECTFULLY SUBMITTED,

By: /s/Jack Jarrett  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 2, 2019, I filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will send a notification of such filing to each counsel of record in this matter.

/s/  
\_\_\_\_\_  
Jack Jarrett (VSB #86176)  
*Counsel for Plaintiff*